

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
FILED

*December 17, 2024*

Nathan Ochsner, Clerk of Court

**UNITED STATES OF AMERICA**

**vs.**

**ZACHARY PEREIRA,  
Defendant.**

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**CRIMINAL NO. 4:24-cr-00641**

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**COUNT ONE  
(Sexual Exploitation of Children)**

From on or about January 12, 2024, through on or about January 13, 2024, within the Southern District of Texas,

**ZACHARY PEREIRA**

defendant herein, did employ, use, persuade, induce, entice and coerce and attempt to employ, use, persuade, induce, entice and coerce a minor child, to wit: Minor Victim 1, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was transmitted using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

**In violation of Title 18, United States Code, Section 2251(a) & (e).**

**COUNT TWO  
(Sex Trafficking of Children)**

From on or about February 22, 2024, through on or about March 25, 2024, in the Southern District of Texas and elsewhere,

**ZACHARY PEREIRA,**

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, namely a minor female known as Minor Victim 1, who had attained the age of 14 but had not attained the age of 18, and benefitted financially and by receiving anything of value from participation in a venture which had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 1 knowing and in reckless disregard of the fact that Minor Victim 1, whom defendant had a reasonable opportunity to observe, would be caused to engage in a commercial sex;

**In violation of Title 18, United States Code, Section 1591(a), (b)(2), and (c).**

**COUNT THREE**  
**(Sex Trafficking of Children)**

From on or about February 22, 2024, through on or about March 25, 2024, in the Southern District of Texas and elsewhere,

**ZACHARY PEREIRA,**

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, namely a minor female known as Minor Victim 2, who had attained the age of 14 but had not attained the age of 18, and benefitted financially and by receiving anything of value from participation in a venture which had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 2 knowing and in reckless disregard of the fact that Minor Victim 2, whom defendant had a reasonable opportunity to observe, would be caused to engage in a commercial sex;

**In violation of Title 18, United States Code, Section 1591(a), (b)(2), and (c).**

**COUNT FOUR**  
**(Sex Trafficking of Children)**

From on or about March 10, 2024, through on or about March 22, 2024, in the Southern District of Texas and elsewhere,

**ZACHARY PEREIRA,**

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, namely a minor female known as Minor Victim 3, who had attained the age of 14 but had not attained the age of 18, and benefitted financially and by receiving anything of value from participation in a venture which had engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 3 knowing and in reckless disregard of the fact that Minor Victim 3, whom defendant had a reasonable opportunity to observe, would be caused to engage in a commercial sex;

**In violation of Title 18, United States Code, Section 1591(a), (b)(2), and (c).**

**COUNT FIVE**  
**(Sexual Exploitation of Children)**

On or about March 25, 2024, within the Southern District of Texas,

**ZACHARY PEREIRA**

defendant herein, did employ, use, persuade, induce, entice and coerce and attempt to employ, use, persuade, induce, entice and coerce a minor child, to wit: Minor Victim 1, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was transmitted using any means and facility of interstate and foreign commerce, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

**In violation of Title 18, United States Code, Section 2251(a) & (e).**

**COUNT SIX**  
**(Distribution of Child Pornography)**

On or about March 24, 2024, within the Southern District of Texas,

**ZACHARY PEREIRA**

defendant herein, did knowingly distribute material that contained child pornography using any means and facility of interstate and foreign commerce, including by computer.

**In violation of Title 18, United States Code, Section 2252A(a)(2)(B) and Section 2252A(b)(1).**

**NOTICE OF CRIMINAL FORFEITURE**  
**(18 U.S.C. § 1594)**

Pursuant to Title 18, United States Code, Section 1594, the United States gives notice to the defendant,

**ZACHARY PEREIRA,**

that in the event of conviction of the offenses alleged in Counts 2-4, as charged in this Indictment, the United States intends to seek forfeiture of:

(a) All property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property, including, but not limited to: an Apple iPhone 12 (IMEI 355658239843762); and

(b) All property, real or personal, that constitutes or is derived from proceeds traceable to or obtained, directly or indirectly, as a result of such offense.

**NOTICE OF CRIMINAL FORFEITURE**  
**18 U.S.C. § 2253(a)**

Pursuant to Title 18, United States Code, Section 2253(a)(2) and (a)(3), the United States gives the defendant notice that in the event of conviction for the offenses charged in Counts 1, 5 and 6 of the Indictment, the United States will seek to forfeit all property, real and personal,

constituting or traceable to gross profits or other proceeds obtained from the offenses charged in Counts 1, 5 and 6; and all property, real and personal, used or intended to be used to commit or to promote the commission of the offenses charged in Counts 1, 5 and 6 or any property traceable to such property, including, but not limited to, the following:

an Apple iPhone 12 (IMEI 355658239843762).

A True Bill:

**Original Signature on File**

Grand Jury Foreperson

ALAMDAR S. HAMDANI  
United States Attorney

By: *Kimberly Ann Leo*  
Kimberly Ann Leo  
Assistant United States Attorney  
713-567-9465